## IN THE UNITED STATES DISTRICT COURT

JUL 1 0 2025 (1986)

FOR THE DISTRICT OF NEW MEXICO

MITCHELL R. ELFERS CLERK

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	CRIMINAL NO. <u>25-2558</u> SM D
vs.	)	18 U.S.C. § 844(d): Transportation of
	)	Explosives with Intent to Kill, Injure, and
GREGORY VANDENBERG, a.k.a.	)	Intimidate.
Grzegorz Vandenberg,	)	
	)	
Defendant.	)	

## INDICTMENT

The Grand Jury charges:

On or about June 12, 2025, in Hidalgo County, in the District of New Mexico, the defendant, **GREGORY VANDENBERG**, transported and received, and attempted to transport and receive, in interstate and foreign commerce, explosives, specifically, approximately six fireworks containing 60 grams of gun powder each and 72 additional fireworks, with knowledge and intent that said explosives would be used to kill, injure, and intimidate an individual.

In violation of 18 U.S.C. § 844(d).

## **FORFEITURE ALLEGATION**

Upon conviction of any offense in violation of 18 U.S.C. § 844(d), the defendant, **GREGORY VANDENBERG**, shall forfeit to the United States, pursuant to 18 U.S.C. § 844(c) and 28 U.S.C. § 2461(c), any explosive materials involved or used or intended to be used in the commission of the offense, including, but not limited to:

- a. approximately 6 Black Cat 5-inch Shells fireworks; and
- b. approximately 72 Black Cat M-150 Salute fireworks.

A TRUE BILL:

FOREPERSON OF THE GRAND JURY

Assistant United States Attorney